REMARKS

This is in response to the Office Action mailed on January 9, 2008. In this Office Action, claim 14 was rejected under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement. Claim 6 was objected to because of an informality, and claims 1, 4-26 and 30 were rejected based on prior art. In this Amendment, claims 1 and 6 have been amended, while the remaining claims are unchanged.

The Office Action objected to claim 6 on the basis of an informality. With this amendment, claim 6 has been amended to recite "are" instead of "all" as suggested by the Office Action. It is requested that the objection to claim 6 be withdrawn.

The Office Action rejected claim 14 under 35 USC 112 as failing to comply with the written description requirement. The Office Action stated that the arguments set forth in the previous response were considered but thought to be non-persuasive. In particular, the Office Action indicated on page 3 that dictation grammar as used in the art at the time the instant invention was made includes a grammar providing a limited set of anticipated input phrases for natural language speech. The Office Action then cited Young US Patent No. 6,064,959 to stand for this assertion. Then the Office Action went on to cite Pokhariyal US Patent Application Publication 2002/0123876. The Office Action stated "usage of dictation grammar includes a grammar supporting rules capable of supporting arbitrary phoneme combinations unfamiliar to a speech processor." The Examiner then contended that these definitions were mutually exclusive because the former definition is directed to a limited dictionary of words while the latter definition is directed to a word specifically not included in a separate limited dictionary.

Applicant submits that the Office Action has cited one section of Pokhariyal taken out of context. Dictation grammars can be used to specify arbitrary words. However, the previous paragraph of Pokhariyal states that "grammars can be divided into three types. Dictation grammars use a context in which words are spoken to enable a speech engine to recognize words from a dictation vocabulary provided with the speech engine." (Emphasis added). It is noted that a dictation vocabulary is provided with the speech engine. This is in

contrast to the position which the Office Action takes, which is that the definition of dictation grammar in Pokhariyal is "directed to words specifically not included in a separate limited dictionary of words." While dictation grammars may be used to specify arbitrary words, there is no teaching that a vocabulary is not provided. In fact, paragraph 0009 of Pakhariyal indicates that a dictation vocabulary is provided. It is submitted therefore that the objection to and rejection of claim 14 be withdrawn since the Examiner has failed to cite appropriate art to stand for the asserted position.

The Office Action rejected claims 1 and 26 as being anticipated by Fujimori. The Office Action indicated that Fujimori disclosed a managed code layer [distributed object model]. The present invention provides an object model interface and managed code. As indicated in the background of the invention, managed code uses the execution environment for memory management, object lifetime, etc. This means a managed code supplies metadata necessary for the common language runtime to provide services such as memory management, cross-language integration, code access security, and automatic lifetime control of objects. The common language runtime manages the execution of programs written in any of several supported languages, allowing them to share common object oriented classes written in any of the languages. The Office Action indicated that the distributed object model taught in Fujimori is a managed code layer. However, as discussed, a managed code layer is much different than a distributed object model.

As discussed in the abstract of Fujimori "a human-machine interface system is designed based on the distributed object model and is configured using application nodes, service nodes, composite nodes, interconnected with a network." A distributed object model using application nodes and service nodes and composite nodes is much different than a managed code layer which uses the execution environment for memory management, object lifetime, etc.

Claim 1 recites: "a managed code layer having a speech-related object model comprising objects exposing speech-related members for use by speech-related applications, the speech-related applications comprising one or more of speech recognition enabled applications

and speech synthesis enabled applications, the speech-related members of the objects used in performing speech processing tasks, comprising one or more of speech recognition and speech synthesis; wherein the managed code layer also includes a non-speech related object model comprising objects exposing non-speech related members for use by applications to perform non-speech related processing tasks" (emphasis added). Since claim 1 recites a "managed code layer" and Fujimori does not teach this limitation, it is submitted that the §102(b) rejection based on Fujimori be withdrawn against claim 1.

Claim 26 recites: "a set of speech-related objects exposing members, accessible by applications that target managed code to perform speech-related tasks, wherein the exposed members are accessible to perform at least one of speech recognition tasks and speech synthesis tasks, and wherein the exposed members are accessible using techniques that are the same as techniques used to access members exposed by non-speech related objects in a platform that contains the speech-related objects" (emphasis added). Claim 26 recites the limitation "managed code" which Fujimori does not teach. It is therefore submitted that claim 26 is in form for allowance over Fujimori.

The Office Action also rejected claims 1, 4-7 and 19-20 as being obvious over Yuen in view of Fujimori. It is noted that claim 26 was not included in this rejection. The Office Action indicated that a managed code layer was taught by an editable object model discussed on page 2, paragraphs 0017 to 0018 of Yuen. Yuen states in paragraph 0018 "Editability of the object model may include combining one or more objects in the model into one object; introduction of one or more objects into the model; deletion of one or more objects from the model; and modification of one or more objects in the model." An editable object model is not the same as a managed code layer. While a managed code layer can make it easier to edit object models, a managed code layer which uses the execution environment for memory management, object lifetime, etc, is still different than an editable object model which allows an object model to combine one or more objects in the model into one object; introduce one or more objects into the model; delete one or more objects from the model; and modify one or more objects in the

model. It is submitted therefore that claim 1 is patentable over the combination of Yuen in view of Fujimori.

In sum, it is submitted that based upon the foregoing, claims 1 and 26 are in form for allowance. Dependent claims 4-7, 19 and 20 were rejected as being unpatentable over Yuen in view of Fujimori. Claims 8-18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Yuen in view of Fujimori and in further view of Lewin (US patent 6,513,010). Claims 21-23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Yuen in view of Fujimori and further in view of Sakai (US Patent Application Publication 2002/0055843). Claims 24-25 were rejected under 35 U.S.C. §103(a) as being unpatentable over Yuen in view of Fujimori in further view of Beutnagel (US Patent 6,078,885). Claim 30 was rejected as being unpatentable over Fujimori in view of Yuen. It is submitted that dependent claims 4-25 and 30 are in form for allowance due to their dependent nature on allowable independent claims. Reconsideration and allowance of the pending claims 1, 4-26 and 30 is solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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